

# City of Tacoma Used Oil Program Update

City of Tacoma

Environmental Services Department

Waste 2 Resources Advisory Committee

November 19, 2013



# History & Background

- Two tanks at Transfer Station Recycling Center
- 5 tanks throughout community at auto parts stores
- Over 1,400,000 gallons collected since 1993
- Now collecting approximately 60,000 gal/year in the DIY tanks



# PCB Contamination

- May 4, 2012 - Vendor pumps 750 gallons from DIY used oil tanks at the Recycling Center.
  - Oil passes standard Chlor-D-Test test
- May 11 - Notified by Vendor that PCBs were found in their bulk tank. Samples collected from both Tacoma tanks.
- May 15, PCBs were found at 95.8 ppm in one of Tacoma's tanks.

# TSCA Regulations

- Toxic Substances Control Act
  - Targets specific materials and wastes
  - Administered by EPA
  - Very narrow household exemptions
  - Strict liability regulation



# Tacoma TSCA Violations

- Failure to Notify EPA of PCB Waste Handling Activities
  - Needs to be done before shipment or removal by vendor
- Failure to Prepare a PCB Waste Manifest
  - Needs to be done when shipping waste oil before shipment or removal by vendor
- Distribution of PCBs in Commerce

# Potential Fines

- Each of the violations carry a maximum violation of \$37,500 per day
- Potential Fine of \$112,500 per day
- Strict Liability starts from the day it is pumped
- Have to test each tank before it is pumped or notify and manifest each tank regardless of contamination
  - Reduces but does not eliminate risk



# Liability

- Disposal liability – extra costs for disposal of contaminated oil
  - Always have this liability
  - Several instances in the past of different types of contamination, usually less than \$4,000/tank
  - Can reduce but not eliminate with tank testing
- Regulatory liability – much higher potential liability for Tacoma

# Current Direction

- Sampling program for Transfer Station tanks and eliminate offsite tank locations
  - Capital and increased operational cost very high to implement this sampling program at the offsite locations
    - Collect sample and lock tank that is sampled
    - Send sample to lab to perform laboratory analysis for PCB
    - Pump and re-open tank if lab results are acceptable
    - Two tanks are needed because of problems when you lock a tank
  - Significantly reduces regulatory liability, reduces disposal liability to about 25% compared to untested tanks





# Cost Estimates

- Additional cost to sample the Transfer Station used oil tanks \$9,000 +
- \$75,000 - \$100,000 to add one tank to each of the five offsite locations
- \$27,000 - \$30,000 to sample all of the offsite locations and transfer station tanks
  - Evenly split between analysis and extra labor costs

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